

## REMARKS/ARGUMENTS

In the first Office Action herein, which was dated June 6, 2005, the Examiner rejected claims 1, 3, 5-7, inclusive, 9 and 10 under 35 U.S.C. § 102(a) as being anticipated by U.S. Patent No. 6, 753, 978 to Chang, and rejected claims 2, 4, and 8 under 35 U.S.C. § 103(a) as being unpatentable over Chang.

In the Specification, no changes

In the Claims, claim 1 is currently amended.

Applicant has carefully given thought to the Examiner's claim rejections, to the single cited and applied prior art reference, and to the specification, claims, abstract and drawings in this case, and proposes by the present Amendment certain modifications in a currently amended version of claim 1, with respect to which applicant asserts that currently amended claim 1, and all of the other dependent claims, clearly distinguish over anything directly shown or suggested by the cited and applied Chang reference. In other words, applicant respectfully asserts that, with entry of the claim changes proposed by the present Amendment, it should be very evident why, and how, applicant's claimed invention is patentable over the Chang reference.

Among the several important features which characterize and distinguish applicant's invention is the feature that applicant's claimed methodology utilizes, for all image pixels, a *same, predetermined numeric value, as a constant percentage value*, to reduce the distributable error which nominally results from the step of applying error filtering in the context both of vector error diffusion, and of the presence and functioning of an output color palette *wherein the palette values remain fixed and unmodified (i.e., unchanged)*. This same-level

numeric reduction value, which, as mentioned, is a predetermined value, is completely independent of those steps of the invention involving error diffusion and error distribution filtering.

Applicants claimed methodology is extremely simple in nature, and very effective in controlling the problem mentioned in this patent application called color bleed. In the practice of applicant's invention, no calculation steps are employed in the implementation of corrective action which minimizes the issue of color bleed. Rather, the same, uniformly applied, numeric value is simply subtracted from a selected one (or ones) of the weighted error distribution values which emerge from each operation of an error filter during color image data processing.

These features of applicant's invention are clearly expressed in currently amended claim 1.

By way of sharp contrast, the cited and applied Chang reference focuses attention on error-diffusion artifacts control (not color-bleed control), and to this end utilizes a complex approach to promoting better color output pixel values emerging from a color palette. It does this through the practice, following error diffusion, of utilizing the error signal to adjust and change what the Chang reference describes as the boundaries for the threshold decisions which are applicable to neighboring pixels. In other words, the Chang reference proposes a boundary-adjustment methodology in which *the output color palette does not possess fixed values*, but rather is treated in such a way that, from processed pixel to processed pixel, its (the palette's) values are modified (changed) in response to filtered outputs tracing back to the step of error diffusion. Thus, whereas applicant's very simple approach to controlling color bleed make no

changes whatsoever to the mentioned output color palette values, and does nothing in the realm of adjusting boundary values, the Chang reference involves changing these values as a technique for controlling error-diffusion artifacts. Additionally, practice in accordance with the Chang reference fully and consciously utilizes *unchanged filter values*, as compared with applicant's practice of consciously making a change, or changes, effectively, in certain ones of such values as part of a focused technique for effecting color-bleed control.

For all of these reasons, and considering the clarifying Amendment which has been made to language in claim 1, applicant respectfully urges that all claims now presented in this application, on the basis of entry of this Amendment, are clearly patentable over anything shown or suggested by the cited and applied Change reference, and are therefore patentable.

Accordingly, favorable reconsideration of this application, and allowance of all claims therein are respectfully solicited. If the Examiner has any questions regarding the amendment or remarks, the Examiner is invited to contact Attorney-of-Record Jon M. Dickinson, Esq., at 503-504-2271.

**Provisional Request for Extension of time in Which to Respond**

Should this response be deemed to be untimely, Applicants hereby request an

extension of time under 37 C.F.R. § 1.136. The Commissioner is hereby authorized to charge any additional fees which may be required, or credit any over-payment to Account No. 22-0258.

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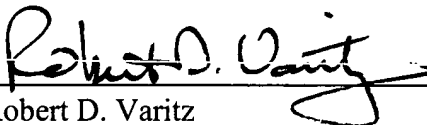
Respectfully Submitted,

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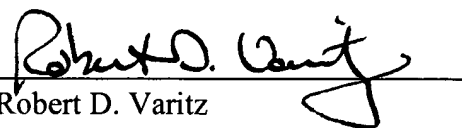
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Date of Deposit - August 19, 2005

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I hereby certify that the attached Response to Office Action under 37 C.F.R. § 1.111 is being deposited with the United States Postal Service "Express Mail Post Office to Addressee" service under 37 C.F.R. 1.10 on the date indicated above and is addressed to:

Mail Stop Amendment  
Commissioner for Patents  
P.O. Box 1450  
Washington, D.C. 22313-1450



Robert D. Varitz